



UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA

3:20-cv-00482-KDB-DSC

JOHNATHAN S. HENSLEY, on)	
behalf of himself and others similarly)	
situated,)	
Plaintiff,)	DECLARATION IN SUPPORT OF
)	DEFENDANT'S RESPONSE AND
v.)	MEMORANDUM OF LAW IN
)	OPPOSITION TO PLAINTIFF'S
CITY OF CHARLOTTE, a North)	MOTION FOR PRELIMINARY
Carolina municipal corporation,)	INJUNCTION
Defendant.)	

Kiersten Frost, pursuant to 28 U.S.C. § 1746, declares and states as follows:

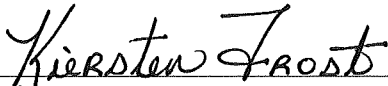
1. I am over the age of eighteen, of sound mind, and am competent to testify.
2. I have personal knowledge of the facts stated in this Declaration.
3. I am the Records Management Division Manager for the City of Charlotte, Charlotte-Mecklenburg Police Department, and I am duly authorized to speak on the matters set forth herein.
4. Effective November 16, 2020, the City of Charlotte, Charlotte-Mecklenburg Police Department, no longer provides to members of the public N.C. DMV-349 accident reports containing "personal information" as defined by 18 U.S.C. § 2725(3).
5. "Personal information" is defined by 18 U.S.C. § 2725(3) as "information that identifies an individual, including an individual's photograph, social security number, driver identification number, name, address (but not the 5-digit zip code),

telephone number, and medical or disability information, but does not include information on vehicular accidents, driving violations, and driver's status."

6. I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

FURTHER THIS DECLARANT SAYETH NOT.

Dated: November 17, 2020.



Kirsten Frost
Records Management Division Manager
Charlotte-Mecklenburg Police Department